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18  
19 UNITED STATES DISTRICT COURT  
20 NORTHERN DISTRICT OF CALIFORNIA  
21

22 DANIEL CISNEROS

23 Plaintiff,

24 vs.

25 VANGILDER, et al.,

26 Defendants.  
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28

No.: 4:16-cv-00735-HSG

**JOINT STIPULATION RE: DEPOSITION  
OF CAPTAIN D. WILCOX AND ORDER**

Judge: Hon. Haywood S. Gilliam Jr.  
Courtroom: 2  
Trial Date: January 14, 2019

1 DANIEL MANRIQUEZ

2 Plaintiff,

3 vs.

4 VANGILDER, et al.,

5 Defendants.  
6

No.: 4:16-cv-01320-HSG

**JOINT STIPULATION RE: DEPOSITION  
OF CAPTAIN D. WILCOX AND ORDER**

Judge: Hon. Haywood S. Gilliam Jr.

Courtroom: 2

Trial Date: January 14, 2019

7 **JOINT STIPULATION**

8 On July 3, 2018, this Court granted Plaintiffs' Daniel Manriquez and Daniel Cisneros  
9 Motion to Amend the Scheduling Order for the sole purpose of allowing Plaintiffs to depose  
10 witness Captain C. Parry. *See* ECF 71, 75. Shortly thereafter, Defense counsel has represented  
11 that Cpt. Parry was not involved in any way with the incident, CDCR's investigation into the  
12 incident, or reviewing the incident report. Rather, Defense counsel has represented that Cpt.  
13 Wilcox is the appropriate witness. Based on these representations by Defense counsel, the parties  
14 seek to stipulate to the following:

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2 It is STIPULATED, by and between the undersigned counsel for Plaintiffs and Defendants,  
3 that non-expert discovery will remain open for the sole purpose of deposing Captain D. Wilcox.  
4 Captain C. Parry will not be deposed unless a party seeks an order from this Court. Plaintiffs and  
5 Defendants further stipulate that Captain D. Wilcox's deposition will take place on July 27, 2018,  
6 and that no further non-expert discovery will be conducted unless otherwise ordered by this  
7 Court.

8  
9 DATED: July 19, 2018

10 /s/ Preeti Bajwa  
11 Preeti Bajwa  
12 Deputy Attorney General  
13 Attorneys for Defendants  
14 S. Cupp, J. Cuske, D. Melton,  
15 K. Ohland, J. Vangilder,  
16 and J. Vasquez

17 DATED: July 19, 2018

18 /s/ Britt M. Roberts  
19 Britt M. Roberts  
20 Reed Smith, LLP  
21 Attorney for Plaintiff Daniel Cisneros

22 DATED: July 19, 2018

23 /s/ Brody A. McBride  
24 Brody A. McBride  
25 Singleton Law Firm  
26 Attorney for Plaintiff Daniel Manriquez

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28 **ORDER**

Upon considering the parties' joint stipulation, it is ORDERED that non-expert discovery will remain open for Plaintiffs to conduct Captain D. Wilcox's deposition, which will take place on July 27, 2018. No other non-expert discovery will be conducted.

**IT IS SO ORDERED.**

DATED: July 19, 2018

  
HON. HAYWOOD S. GILLIAM JR.

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